

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>RAHEEM WILSON,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Hakeem Wilson"</b>	<b>:</b>	<b>18 U.S.C. § 1951</b>
	<b>:</b>	<b>(interference with interstate commerce by</b>
	<b>:</b>	<b>robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)</b>
	<b>:</b>	<b>(using and carrying a firearm during and in</b>
	<b>:</b>	<b>relation to a crime of violence - 1 count)</b>
	<b>:</b>	<b>8 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times relevant to this Indictment, the McDonald's Restaurant located at 3654 N. Broad Street, Philadelphia, Pennsylvania, was engaged in activities that affected interstate commerce, selling food to its customers.

2. On or about July 22, 2003, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAHEEM WILSON,**  
**a/k/a**  
**"Hakeem Wilson,"**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce by robbery, in that the defendant unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash from the McDonald's Restaurant, located at 3654 North Broad Street in Philadelphia, Pennsylvania, in the presence of the store manager, and

others, and against the manager's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the manager of the McDonald's Restaurant, by pointing a firearm at her and threatening to shoot her.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES:**

On or about July 22, 2003, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**RAHEEM WILSON,  
a/k/a  
“Hakeem Wilson,”**

knowingly used and carried, and aided and abetted in the use and carrying of, a firearm, that is a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951 and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

---

**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**